

MEMO ENDORSED

TANNER & ORTEGA, L.L.P.

ATTORNEYS AT LAW
WWW.TANNERORTEGA.COM

HOWARD E. TANNER*
HUGO G. ORTEGA

*MEMBER OF N.Y., N.J. AND D.C. BAR

NEW YORK CITY OFFICE
299 BROADWAY
SUITE 1700
NEW YORK, NY 10007
OFFICE: (212) 962-1333
FAX: (212) 962-1778


WHITE PLAINS OFFICE
175 MAIN STREET
SUITE 800
WHITE PLAINS, NY 10601
OFFICE: (914) 358-5998
FAX: (914) 761-0995

July 13, 2020

Honorable Nelson Roman
United States District Judge
United States District Courthouse
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

The temporary modification of bond conditions as set forth below is granted without objection. Clerk of the Court requested to terminate the motion (doc. 70).

Dated: July 14, 2020 SO ORDERED.


Nelson S. Román, U.S.D.J.

BY ECF and EMAIL/PDF

Re: USA v. Brian Rodriguez, 19 Cr. 449 (NSR) -02
Request for Temporary Modification of Bond Conditions

Dear Judge Roman:

I am appointed to represent the defendant pursuant to CJA, who is charged with Hobbs Act Robbery conspiracy as well as a related firearms count. On May 1, 2019, the Honorable Judith C. McCarthy granted the defendant's request for bond and he was released on an unsecured bond of \$100,000, co-signed by three financially responsible persons, two of whom also for moral suasion, with strict conditions of electronic monitoring and home confinement. (ECF Doc No. 7). He has been fully compliant with all conditions of release.


My client is requesting permission go to the Cross County Mall in Yonkers, New York on July 16, 2020, from 1:00 pm – 4:00 pm to buy some board games and perhaps new clothes to celebrate his birthday on July 17th at his home with family and friends.

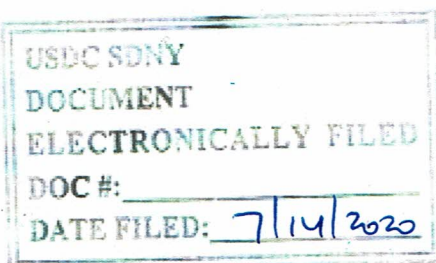
I therefore write to the Court to request that the defendant's home confinement and strict electronic monitoring conditions be temporarily suspended on July 16, 2020, from 1:00 pm – 4:00 pm and for those conditions to resume at the end of that period. I am informed by Pretrial Services and the Government that there is no objection to this application.

Thank you, Your Honor, for your consideration of this matter.

Very truly yours,

Tanner & Ortega, L.L.P.


Howard E. Tanner



cc: AUSA Lindsey Keenan (By ECF and Email/PDF)
PTSO Leo Barrios (By Email/PDF)